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6 Attorneys for Plaintiffs

7 **UNITED STATES DISTRICT COURT**

8 **NORTHERN DISTRICT OF CALIFORNIA**

9
10 **STEPHANIE SMARGISSO**, *Individually and*
11 *as successor-in-interest to Decedent WILLIAM*
12 *ANKIEL JR., and WILLIAM ANKIEL III,*
13 **MARY BEECHLER**, and **ANNAMARIE**
BRANDENBURGER, *Individually,*

14 Plaintiffs,

15 vs.

16 **AIR & LIQUID SYSTEMS CORPORATION**,
et. al.,

17 Defendants.

Case No. 3:23-cv-01414-RFL

**DECLARATION OF ANDREW SEITZ
IN SUPPORT OF PLAINTIFFS'
MOTION FOR SUMMARY
ADJUDICATION AS TO DEFENDANT
REDCO CORPORATION F/K/A
CRANE CO.'S AFFIRMATIVE
DEFENSES**

Action Filed: March 24, 2023

Trial Date: October 28, 2024

1 I, Andrew Seitz, declare as follows:

2 1. I am an attorney licensed to practice before all the Courts of the State of California and
3 in this district, and am a partner to the Frost Law Firm, PC, counsel of record for Plaintiffs herein. I have
4 personal knowledge of the facts stated in this declaration, except as otherwise stated. If called as a
5 witness, I could and would competently testify as set forth herein.

6 2. Attached as **Exhibit 1** is a true and correct copy of Redco Corporation's (Formerly
7 Known as Crane Co.) Answer to Plaintiffs' Complaint; Demand for Jury Trial.

8 3. Attached as **Exhibit 2** is a true and correct copy of the report issued by Plaintiff's expert,
9 Captain Arnold Moore, issued on January 30, 2024.

10 4. Attached as **Exhibit 3** is a true and correct copy of the relevant portions of the Deposition
11 of Captain Arnold Moore, taken on May 29, 2024.

12 5. Attached as **Exhibit 4** is a true and correct copy of the relevant portions of Crane Co.'s
13 Objections and Responses to Plaintiff's LAOSD General Order Standard Interrogatories to Defendant
14 Crane Co. and subsequent Verification in the case, *Martha Ramos, et al. v. 3M Company, et al.*, Case
15 No. 21STCV23911 filed in the Superior Court of the State of California, County of Los Angeles.

16 I declare under penalty of perjury, under the laws of the State of California, that the
17 foregoing is true and correct. Executed July 1, 2024, in San Pedro, California.

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21 /s/ Andrew Seitz

22 ANDREW SEITZ

23 Declarant
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CERTIFICATE OF SERVICE

I declare that I am over the age of 18, not a party to the above-entitled action, and am an employee of Frost Law Firm, PC whose business address is 273 West 7th Street, San Pedro, CA 90731.

On July 2, 2024, I served the following document(s) in the following manner(s):

DECLARATION OF ANDREW SEITZ IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY ADJUDICATION AS TO DEFENDANT REDCO CORPORATION F/K/A CRANE CO.'S AFFIRMATIVE DEFENSES

on the following:

ALL COUNSEL OF RECORD

☒ (By CM/ECF) By transmitting electronically via CM/ECF the document(s) listed above as set forth on the electronic service list on this date before 11:59 p.m.

☐ (By E-Service). I electronically served the documents(s) via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

☐ (By E-mail) On this date, the above-referenced documents were converted to electronic files and e-mailed to the addresses shown.

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed: July 2, 2024.

/s/ Deborah Rowe
An Employee of Frost Law Firm, PC